

Exhibit 48

Haefele, Robert

From: Carter, Sean [<mailto:SCarter1@cozen.com>]
Sent: Friday, September 28, 2012 8:14 PM
To: Cmanning; Carter, Sean; Tarbutton, J. Scott
Cc: 'rhaefele@motleyrice.com'; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]
Subject: Re: 03 MDL 1570 -- Sanabel Defendants

Chris - Per my September 6 correspondence, we left it that we were amenable to having a call, but that all of our earlier discussions contemplated that your clients would respond to our discovery in due course, and within the time set by the Court. While I can appreciate the interest in getting this resolved, we've been consistent since you raised this in 2010 that we needed certain documents to even consider what you were proposing. If you want to discuss next week, I'm sure we can find time. Regards, Sean

From: Cmanning [<mailto:Cmanning@manning-sossamon.com>]
Sent: Friday, September 28, 2012 08:03 PM
To: WTC[cmanning@manning-sossamon.com]; Carter, Sean; Tarbutton, J. Scott
Cc: Haefele, Robert <rhaefele@motleyrice.com>; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]
Subject: RE: 03 MDL 1570 -- Sanabel Defendants

Sean:

What is the status on this? We would like to get this resolved.

Chris

From: Cmanning
Sent: Thursday, September 06, 2012 10:24 AM
To: Carter, Sean; Tarbutton, J. Scott
Cc: 'Haefele, Robert'; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]
Subject: RE: 03 MDL 1570 -- Sanabel Defendants

Sean:

I understand your sentiment perfectly. I have had a few conversations with Scott, I believe, on topic and we were in general agreement about how my clients could agree to cooperate in order to get a full release. It has admittedly been difficult to get my clients onboard to date because Mr. Hilliali is, quite frankly, a very cautious individual. My point in my email was to request a writing laying out the terms of what you would propose (to include language indicating that all Plaintiffs in the case could not later sue my clients). I would then be able to show that writing to Mr. Hilliali to give him a greater level of comfort with proceeding.

A conference call on point sounds good. The remainder of this week is difficult for me but how about Monday or Tuesday of next week?

Best,

Chris

From: Carter, Sean [<mailto:SCarter1@cozen.com>]
Sent: Thursday, September 06, 2012 9:28 AM
To: Cmanning; Cmanning; Tarbutton, J. Scott
Cc: 'Haefele, Robert'; WTC[amaloney@kreindler.com]; WTC[jgoldman@andersonkill.com]
Subject: RE: 03 MDL 1570 -- Sanabel Defendants

Chris – Our apologies for not responding immediately to your inquiry, but we needed to go back and review our earlier correspondence to confirm our recollections about where we last left things relative to your settlement proposal. We'll follow up with a more complete summary of our exchanges on this issue, but as I am sure your own correspondence files will reflect, we advised you in late 2010 that we would need to review certain categories of information before we could even begin to entertain substantive discussions about a possible settlement. You thereafter expressed your preference to provide the materials at issue within the context of the formal discovery process, and we consented to several extensions for your clients to respond to our discovery demands. It was our expectation that we would have received the responsive productions some time ago, and most certainly before the August 30, 2012 production deadline. Your email of August 30 suggests that plaintiffs had at some point proposed potential parameters for a settlement with your clients, which is not the case. Again, we made clear that we would (at a minimum) need to review certain categories of information, which we identified in late 2010, in order to consider your clients' expressed interest in settlement discussions. Given that we still have not received that information, we are frankly a bit puzzled by the request for us to outline a settlement proposal and release terms. We'd be happy to have a conference call to discuss these issues further. Let us know and thanks, Sean

From: Cmanning [<mailto:Cmanning@manning-sossamon.com>]
Sent: Thursday, September 06, 2012 8:24 AM
To: WTC[cmanning@manning-sossamo]; Tarbutton, J. Scott
Cc: Carter, Sean
Subject: RE: 03 MDL 1570 -- Sanabel Defendants

Scott:

Just a quick follow-up – any progress on this issue?

Best,

Chris

From: Cmanning
Sent: Thursday, August 30, 2012 3:14 PM
To: STarbutton@cozen.com
Cc: SCarter1@cozen.com
Subject: Re: 03 MDL 1570 -- Sanabel Defendants

Thanks, Scott.

To follow up on our settlement issue, I remain very interested in the resolving the matter since my client has no funds to really continue a defense.

However, I have had difficulty convincing my client's president (Dr. Abdel Hillali) that he can have comfort in knowing that, once he cooperates with interviews and the other issues we discussed, my client will be forever released--and that the Plaintiffs will not later use any information he produces against him or the client later. Dr. Hillali is an intelligent man but not overly trusting under certain circumstances.

To give my client comfort that you would be providing a full release, could you describe your settlement proposal and

release terms in a letter emailed to me so that I may forward it to him? That would be most helpful.

Again, my apologies for the delay--you have been most patient.

Best,

Chris

From: Tarbutton, J. Scott [<mailto:STarbutton@cozen.com>]
Sent: Thursday, August 30, 2012 11:51 AM
To: Cmanning
Cc: Carter, Sean <SCarter1@cozen.com>
Subject: 03 MDL 1570 -- Sanabel Defendants

Chris – Following up on my August 29, 2012 letter to you, attached please find the *Federal Insurance* Plaintiffs' Supplemental Document Production Index for defendants Sana Bell, Inc. and Sanabel al Kheer, Inc. I understand that the letter and hard drive containing the *Federal Insurance* Plaintiffs' document production have been successfully delivered to your office today.

Regards,

Scott

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